



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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1410 North Hillen • Boise, Idaho 83706-1256 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Alstad, Director

December 12, 2001

Mr. T.M. Bradley
Manager, Naval Reactors Idaho Branch Office
U.S. Department of Energy
Pittsburgh Naval Reactors Office
P.O. Box 2469
Idaho Falls, Idaho 83403-2469

RE: Recommended Course of Action for the Naval Reactors Facility site NRF-21A,
Operable Unit (OU) 8-8

Dear Mr. Bradley:

We received your December 4, 2001 letter, with attached documentation, pertaining to the selected remedy for site NRF-21A, the Old Sewage Basin. The attachment describes new information discovered during initial implementation of the remedial action. In particular, the attachment describes new assumptions that increase the size of the site and the presence of more extensive contamination than anticipated when the OU 8-8 Record of Decision (ROD) was signed. The attachment evaluates several ways of modifying the selected remedy to address the new information. On the basis of this evaluation, you recommend securing and grading the present excavation at site 21A, removing the existing mounded area, and designing and constructing an engineered soil cover over the site. Your letter states that modifying the selected remedy for this site in accordance with the recommendations will require preparation of an Explanation of Significant Difference (ESD) to the 1998 OU 8-8 ROD.

We have reviewed the information provided in your letter and attachment, and concur with the recommendations. We agree that the proposed modification to the OU 8-8 selected remedy for site NRF-21 A is protective, and that it is the most cost-effective option. This option is consistent with rationale used in selecting the on-site consolidation remedy in the 1998 ROD. We also agree that the proposed remedy modification will require an ESD of that ROD due to the changed scope of the remedial action for site 21A.

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If you have any questions regarding this letter of concurrence, please contact Margie English of my staff, at (208) 373-0306.

Sincerely,



Dean Nygard
INEEL Site Remediation Program Manager
Waste Management and Remediation Program

ME/jc

cc: Wayne Pierre, USEPA Region X
Margie English, DEQ-TS
Kathy Ivy, USEPA Region X
Daryl Koch, DEQ-WMRD